



Bureau of Consumer Protection
Division of Enforcement

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VIA EMAIL

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Dear Mr. Roberts:

We received your submissions on behalf of Aqua Marine Deck, Inc. (“Aqua Marine” or the “Company”). During our review, we discussed concerns that marketing materials with broad, unqualified claims that Aqua Marine products are made in the United States may have failed to account for the fact that certain of the Company’s marine decking products contain significant foreign content.

As discussed, unqualified U.S.-origin claims in marketing materials – including claims that products are “Made,” “Built,” or “Manufactured” in the USA – likely suggest to consumers that all products advertised in those materials are “all or virtually all” made in the United States.¹ The Commission may analyze a number of different factors to determine whether a product is “all or virtually all” made in the United States, including the proportion of the product’s total manufacturing costs attributable to U.S. parts and processi

